

JUL 21 1994

Colonel Robert E. Dawson
Wing Commander
380 ARW/CC
170 Arizona Avenue
Plattsburgh Air Force Base
New York, 12903-2114

Re: Submittal of Records of Decision for Sites LF-023
(Institutional Controls) and SS-020 (No Further Action) at
Plattsburgh Air Force Base, NY

Dear Colonel Dawson:

This office has received for co-signature, copies of the Records of Decision (RODs) for Sites LF-023 (Landfill 023 Groundwater, Surface Water, and Sediment) and SS-020 (Civil Engineering Squadron Pesticide Tank) at Plattsburgh Air Force Base (PAFB), New York. Regrettably, we are unable to sign the RODs in the form submitted, and require that several changes be made to them.

Annotated copies of the RODs, reflecting changes we require prior to signature, are enclosed. In addition, Attachment I to this letter contains sections of the Pesticide Tank ROD that we have rewritten rather than annotated.

We appreciate the concerted effort that you and your staff have made in developing these RODs and your commitment to protecting human health and the environment at PAFB. We look forward to your earliest resubmittal of these RODs. If you have any questions, please have your staff contact Robert Morse, project manager for PAFB, at (212) 264-1841.

Sincerely yours,

Kathleen C. Callahan, Director
Emergency and Remedial Response Division

Enclosures

202819



cc: Michael O'Toole, NYSDEC, w/o encl
Phillip H. Clark, USAF HQ, w/o encl
Timothy P. Corbett, AMC HQ, w/o encl
Michael D. Sorel, PAFB, w/o encl
Marsden Chen, NYSDEC, w/encl
James Lister, NYSDEC, w/o encl

bcc: H. Guzman, ORC, w/attach
R. Wing, ERRD, w/o attach
R. Morse, ERRD, w/o attach ✓

ATTACHMENT I

Record of Decision: Site ST-020 Pesticide Storage

Sections Rewritten by USEPA

- 1) Replace the 3rd and 4th paragraphs of Section 5.0, Removal Action, with the following:

In addition to samples collected by Plattsburgh AFB, the contractor, Jo-Ja Construction, collected samples prior to disposing of the tank and the tank contents. Jo-Ja collected five samples from soils remaining in the open excavation approximately three feet beneath the former location of the tank floor, one sample from the tank contents (liquid), and one sample from the soils that had been excavated. Toxicity Characteristic Leachate Procedure (TCLP) analyses were conducted on all six soil samples. The analyses for pesticides conducted on the six soil samples included the seven pesticides initially tested for in the sample taken from the tank contents by PAFB staff in 1992. The tank contents sample collected by Jo-Ja was analyzed for dursban and bendiocarb. The only contaminant identified in the seven samples taken by Jo-Ja was dursban, at a concentration of 0.7 ppb, from the liquid tank contents sample.

Plattsburgh AFB does not believe there is a need to install monitoring wells and collect groundwater samples because significant contamination was not identified in the soils underlying the tank or in the tank contents, and because dursban is not water soluble. Plattsburgh AFB believes that if a contaminant migrated to the groundwater, approximately fifteen to twenty feet deep, that it would also be detected in the migration path to the groundwater. Furthermore, groundwater southeast of Site ST-020 was investigated as part of the RI at the adjacent Auto Hobby Shop Site (Site SS-018). None of the Target Compound List (TCL) pesticides were detected in groundwater samples from three monitoring wells installed at Site SS-018.

- 2) Replace Section 6.0, Risk Assessment, in its entirety with the following:

Dursban was the only chemical detected after the removal action. It was detected in only one of the five soil samples Plattsburgh AFB collected from the excavation floor (concentration 134 ppb). Dursban was detected in the liquid tank contents sample collected by the contractor at a concentration of 0.7 ppb.

The active ingredient in Dursban, known as chlorpyrifos, is not a known or suspected human carcinogen. The only known effect from inhaling or ingesting chlorpyrifos is temporary reduced cholinesterase levels in plasma, red blood cells, and nerve endings. The National Academy of Science has recommended a 24

hour exposure guideline for inhalation of chlorpyrifos of 10 micrograms per cubic meter of air for an adult. This is equivalent to 200 micrograms per day based on an average adult inhalation rate of 20 cubic meters of air per day. Published data with respect to No-Observable-Effect Levels (NOELs) for ingestion of chlorpyrifos were not available. The level that dursban was detected at in the remaining soils, however, is not expected to have any significant adverse impact on human health or the environment. The entire excavation has been backfilled and is protected by clean soil.

3) Replace Section 8.0, Justification, with new Section 8.0, Statutory Determinations, as follows:

The lead agency, Plattsburgh AFB, has determined that this no-further-action decision is consistent with Section 300.430 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The removal action was considered to be protective of human health and the environment, compliant with federal and state action, chemical, and location-specific requirements that are legally applicable or relevant and appropriate to the remedial action (ARARs), and was cost effective.

The chosen remedial action for SS-020 is No Further Action. This action does not differ from the decision presented in the Proposed Plan.